

## MEMO ENDORSEMENT

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September 16, 2021

**Granted.**

**VIA ECF**

Honorable Lewis A. Kaplan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**/s/ Lewis A. Kaplan /PCM**  
**United States District Judge**

**9/17/2021**

**Re: Wanda Munoz et al. v. City of New York, et al.**  
**17-CV-9583 (LAK) (DCF)**

Your Honor:

I am the Senior Counsel in the Special Federal Litigation Division of the New York City Law Department assigned to represent defendants in the above-referenced matter. Defendants write, on behalf of both themselves and plaintiff, to respectfully request an extension of time, from September 21, 2021 to October 21, 2021, within which the parties may object to the Report and Recommendation issued by Magistrate Judge Debra C. Freeman on September 7, 2021. This is the first request for an extension made by the parties, and it is not expected to conflict with any other deadlines in this case.

I was assigned to this matter this summer, after summary judgment briefing had been completed. Given the voluminous record and lengthy and thoughtful report by Magistrate Judge Freeman, as well as competing deadlines in several other cases, I will need more than two weeks to familiarize myself with the case and write a meaningful opposition to the Report and Recommendation.

For the reasons set forth above, defendants, on behalf of both parties, respectfully request that the Court grant an enlargement of time for the parties to object to Magistrate Judge Freeman's Report and Recommendation of 30 days to and including October 21, 2021. This will give the parties the time and opportunity needed to properly formulate their objections in light of the above circumstances.

Thank you for your consideration herein.

Respectfully submitted,

/s/ *Katherine J. Weall*

Katherine J. Weall  
*Senior Counsel*  
Special Federal Litigation Division

cc: Scott Simpson, Esq. (Via ECF)  
Brenna Rabinowitz, Esq. (Via ECF)  
*Attorneys for Plaintiffs*